



United States Attorney
Northern District of Texas

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February 16, 2018

Magistrate Judge Irma C. Ramirez
United States District Court
Northern District of Texas
1100 Commerce Street, Room 1567
Dallas, Texas 75242

Re: *United States v. Harris*, Case No. 3:17-CR-103-M

Dear Judge Ramirez:

The government is bringing the attached filing to your attention per the presiding district court's "Order of Referral" in the above-referenced matter. (Dkt. 308.)

Very truly yours,

ERIN NEALY COX
United States Attorney

/s/ Russell W. Fusco
Russell W. Fusco
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO. 3:17-CR-103-M

BRADLEY J. HARRIS (1)

MOTION FOR DETENTION

The United States moves for detention of defendant, **Bradley J. Harris**, pursuant to Crim. Rule 5(d)(3) and 18 U.S.C. §3142.

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

____ Crime of violence (18 U.S.C. §3156);

____ Maximum sentence life imprisonment or death

____ 10 + year drug offense

____ Felony, with two prior convictions in above categories

 X Serious risk defendant will flee

____ Serious risk obstruction of justice

____ Felony involving a minor victim

____ Felony involving a firearm, destructive device, or any other
dangerous weapon

____ Felony involving a failure to register (18 U.S.C. § 2250)

☒ Violation of State or Federal law while on release pending trial for a felony under Federal, State, or local law

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

☒ Defendant's appearance as required

☒ Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because (check one or both):

☐ Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

☐ Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

☐ Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

☐ Previous conviction for "eligible" offense committed while on pretrial bond

☒ Probable cause to believe Defendant violated terms of pretrial release, 18 U.S.C. § 3148.

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

☐ At first appearance

X After continuance of 1 days (not more than 3).

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the defendants in accordance with the Federal Rules of Criminal Procedure on this 16th day of February, 2018.

/s/ Russell W. Fusco
Russell W. Fusco
Assistant United States Attorney